

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

*Plaintiff,*

v.

IQVIA HOLDINGS INC. and PROPEL  
MEDIA, INC.,

*Defendants.*

Case No.: 1:23-cv-6188 (ER)

**DECLARATION OF RICHELLE  
GERNAN IN SUPPORT OF MOTION  
FOR ADMISSION *PRO HAC VICE***

**DECLARATION OF RICHELLE GERMAN IN SUPPORT OF MOTION FOR  
ADMISSION *PRO HAC VICE***

I, Richelle Gernan, hereby declare:

1. I am an attorney with the law firm of Morrison & Foerster LLP.
2. I submit this declaration in support of the motion for my admission *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the District of Columbia.
4. I have never been convicted of a felony.
5. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
6. There are no pending disciplinary proceedings in any state or federal court.
7. I respectfully request admission *pro hac vice* to appear as counsel in this matter for defendant Propel Media, Inc.

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 19, 2023  
Washington, D.C.

By: /s/ *Richelle Gernan*  
Richelle Gernan